

**IN THE UNITED STATES DISTRICT COURT FOR
THE MIDDLE DISTRICT OF ALABAMA
SOUTHERN DIVISION**

CURLY YOUNG,

Plaintiff,

vs.

**HONEYWELL TECHNOLOGY
SOLUTIONS, INC.,**

Defendant.

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CASE NO:

1:06-CV-00563-SRW

REPORT OF PARTIES' RULE 26 PLANNING MEETING

1. Pursuant to Fed R. Civ. P. 26(f), on September 18, 2006, the parties discussed and agreed to the following schedule for discovery and trial:

2. Pre-Discovery Disclosures. Defendant proposes that the parties will exchange by October 26, 2006, the information required by Rule 26.

3. Discovery Plan. Defendant proposes the following discovery plan:

- a. Discovery will be needed on Plaintiff's claims and Defendant's defenses.
- b. All discovery commenced in time to be completed by 5/15/07.
- c. The parties request a maximum of 25 interrogatories by each party to any other party. Responses due 30 days after service.
- d. The parties request a maximum of 20 Requests for Production. Responses due 30 days after service.
- e. The parties request a maximum of 15 Requests for Admission. Responses due 30 days after service.
- f. The parties request a maximum of 8 depositions by each party.

- g. Each deposition limited to maximum of 7 hours unless extended by agreement of parties.
 - h. Reports from retained experts under Rule 26(a)(2) due: from Plaintiff by February 15, 2007; from Defendant by March 15, 2007.
 - i. Supplementation under Rule 26(e) due 30 days after receipt of information and last supplementation 30 days before the close of discovery.
4. Other items. The parties do not request a conference with the Court before entry of the Scheduling Order.
- a. The parties request a pretrial conference in August, 2007.
 - b. The Plaintiff should be allowed until January 15, 2007, to join additional parties and amend the pleadings. The Defendant should be allowed until February 15, 2007, to join additional parties and amend the pleadings.
 - c. All potentially dispositive motions should be filed by May 1, 2007.
 - d. Settlement cannot be evaluated prior to the commencement of discovery.
 - e. Final lists of witnesses and exhibits under Rule 26(a)(3) should be due three weeks before trial.
 - f. Parties should have 10 days after service of final lists of witnesses and exhibits to list objections under Rule 26(a)(3).
 - g. The case should be ready for trial by the scheduled trial term beginning October 1, 2007 in Dothan, Alabama and at this time is expected to take approximately three days.

Date: September 26, 2006

Respectfully submitted,

s/Jeffrey William Bennett

Jeffrey William Bennett (ASB- _____)

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